OFAC Control

Clerk One

- Input Transaction in Data Pro
- *Procedure*

Supervisor

- Input Verified
- System Indicates Possible OFAC Violation
- Further Investigation Required
- False Hit → Approve/Release Payment
- *Procedure*
- Authorize Hold on Payment

Compliance Officer

- Review Referred Transaction
- STOP
- Determined to be False Hit
- Actual OFAC Violation → Verify Transaction Violates OFAC Regulations/ Contact OFAC via Telephone
- Prepare Report to Authorities
- *Procedure*

RPC Exhibit A-5